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Attorneys for Plaintiff Simple Finance  
Technology Corp.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**SIMPLE FINANCE TECHNOLOGY  
CORP.**, a Delaware corporation,

Plaintiff,

v.

**SIMPLE RTO, LLC, d/b/a SIMPLE  
FINANCE**, a Utah limited liability  
corporation,

Defendant.

**No. 3:16-cv-00801-BR**

**MOTION TO FILE DOCUMENTS UNDER  
SEAL PURSUANT TO LR 3-7**

**LOCAL RULE 7-1 CERTIFICATION**

Counsel for plaintiff Simple Finance Technology Corp. (“Simple Finance” or “Plaintiffs”) conferred telephonically with counsel for defendant Simple RTO, LLC (“Simple RTO” or “Defendant”) regarding the substance of this motion. While Simple RTO does not object to Simple Finance filing confidential information under seal conceptually, Simple RTO reserves its

1- **MOTION TO FILE DOCUMENTS UNDER SEAL  
PURSUANT TO LR 3-7**

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rights to object to the designation of information as confidential and any sealing of such information.

### **MOTION**

The parties have not agreed to a stipulated protective order in this case, and the Court, therefore, has not entered any such order in this case. Simple Finance requests the Court file the enclosed Motion for Preliminary Injunction and Supporting Memorandum (“Motion”), Declaration of Valarie Hamm Carlson (“Carlson Declaration”) with accompanying exhibits, and Declaration of Erik Wasik (“Wasik Declaration”) with accompanying exhibits under seal. The documents contain confidential financial and proprietary business information of Simple Finance and confidential settlement communication with Simple RTO on pages 3-7, 10 and 21 of the Motion, in paragraphs 4, 9-11, 17, 18, 22, 23, and 26 of the Carlson Declaration, and exhibits 6-12 of the Wasik Declaration.

DATED: June 17, 2016

### **PERKINS COIE LLP**

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